

11-696

Dear Sir,

FEDERAL  
ADMINISTRATION

MC-96-28

96 NOV 14 48:13

this letter aint going to  
be for you LEGS. REGS. DIV.

Quit hounding yourself -

You had a chance years ago -

You all wrote a law - No  
overtime for truckers -

No law - for overtime for  
truck drivers - But one for  
all or almost all other industries

Also - Detention's time laws  
were installed years ago  
and you all were bought  
off by Bing Elumsey steel  
mills & food dist centers

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FHWA-97-2350-4 QA-21390

(E.R.)  
I have neither the hope  
Nor the faith in the  
DOT integrity that  
something fair will be  
worked out for truck  
drivers except longer  
hours & shorter pay.

Very Sincerely  
Therman Lomax  
808127

Brombe City

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PAGE 2 OF 2

P.S. There's more - but you don't know

Docket Number MC 96-28  
Attention Office of the General Council, FHWA  
400 Seventh St. SW  
Washington DC 20590

Mark Gowan  
1825 Boulder Dr.  
Plano, TX 75023

RECEIVED  
ADMINISTRATION  
96 NOV 27 A 9:3  
LEGS./REGS. DIV.

November 14, 1996"

Att.: Office of the General Assembly;

**After** reading an excerpt containing ideas regarding the control and/or tracking of professional drivers and their hours on duty, I decided to write.

I understand the problems faced by the General Assembly with regards to safety and today's truck driver. There are drivers now and in the past that have not been responsible and have taken risks that were far **from** acceptable. The problem, like most, is not one that has one cause and therefore has many possible solutions. The problem, however, is many times looked upon from one angle only.

Two years ago, I ventured to fulfill a boyhood dream of mine; to drive a truck. The job has taught me many things including respect for the vehicle itself and the fact that so many, including some so-called professional drivers do not have that respect for themselves, much less the vehicle they are driving, be that a rig or an automobile.

In the article the possibility of in-cab tracking devices such as cameras were mentioned. Computers are already used more-so for ease of picking up and delivering loads, but are used to track and control the drivers actions while on-the-job as well. Other possible devices were discussed and they all seemed to be based around controlling and monitoring the driver,

I agree that many, but not all, times the driver is at fault but why the driver is at fault should be questioned. It seems, with the ideas such as cameras and computers etc.. ,

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that the issue is being taken **from** the point of view that the drivers that are causing the problems are the *best drivers available*. That may not be the case.

Many companies hire drivers with little or no background check. The rules set out for the purpose of public safety are disregarded, many times, by both the companies and the drivers. The average education in order to drive an 80,000 lb. vehicle down the nations highways is *three to* four weeks. Truck driving many times is looked upon as a “last resort” career and is therefore considered to be such by many. The amount of work and hours compared to the average income of a professional driver is dismal. Especially when one thinks about the responsibility of driving a vehicle of that size and cost on a daily basis. Many times drivers must fight to be paid for work that they are *expected* to do.

The introduction of tracking and monitoring devices in the cab of a truck would do little to raise the level of pride and respect of a person in doing his or her job. Those devices are signs of distrust in the eyes of many, including myself and I feel would only be detrimental to the goal that I think the General Council is aiming toward.

What is the solution, then?! ***Make truck driving more respectable and hire qualified people for the job*** by making background checks necessary *all the time* and going through with them in all cases. Make truck-driving schools offer a better, more enhanced program to suit the needs of today’s professional driver and their companies. Putting more qualified people in the rigs would also change the “last resort” viewpoint that many seem to have. Higher qualified and better educated people will raise the esteem of those in the business and hence raise the level of respect that people have for the transportation industry. It would raise the respect that the companies have for their drivers as well as the respect that drivers have for the companies. Raising everyone’s expectations *of themselves* will raise their respect for others. This will mean offering more pay to drivers. “More pay” does not mean extravagant raises but it does mean paying

57046 Hummingbird CT  
Hoosier, IN 46526

Docket # MC 96-28  
Office of General Counsel  
FHWA, 400 7th St, SW  
Washington, DC 20590

FEDERAL  
ADMINISTRATION

November 11, 1996

96 NOV 17 AIO: 30

Dear Sirs,

LEGS./REGS. DIV.

I went to comment on proposed rule changes on hours of service regulations.

I am a OTR truck driver and owner operator. I believe the present rules are inefficient & burdensome to all involved.

I would like to see changes in the rules to fifteen hours of on duty service in any 24 hour period. The time could be used for driving, loading & unloading on duty status. After 15 hours on duty a driver would have to take a minimum eight hour break or three hours off duty in any 24 hour period.

Also I would like to see upto eight days service then one day (24 hr) off duty required. Then restart the eight day schedule again.

There would be no accumulation of hours to add & subtract. This would be much simpler system, easier to work with and easier to keep track of and easier to enforce.

Enclosed is an example of a 24 hour log sheet.

Sincerely,  
Richard Colver

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# EXAMPLE OF **REVISED SCHEDULE**

## **DRIVER'S DAILY LOG** (ONE CALENDAR DAY 24 HOURS)

ORIGINAL File each day at home terminal  
DUPLICATE Driver retains in his possession for eight days

## **RECAP**

(MONTH) (DAY) (YEAR)

(TOTAL MILEAGE TODAY)

I certify these entries are true and correct:

VEHICLE NUMBERS (SHOW EACH UNIT)

**MAXIMUM 8 DAYS OF SERVICE THEN 24 HRS OFF DUTY AND**  
(TOTAL MILES DRIVING TODAY) (DRIVER'S SIGNATURE IN FULL)

**RESTART THE DUTY CYCLE.**  
(NAME OF CARRIER OR CARRIERS)

(NAME OF CO-DRIVER)

**24 HR PERIOD**

(MAIN OFFICE ADDRESS)

(HOME TERMINAL ADDRESS)

	MID-NIGHT	1	2	3	4	5	6	7	8	9	10	11	NOON	1	2	3	4	5	6	7	8	9	10	11	TOTAL HOURS
1: OFF DUTY																									1 1/2 HR
2: SLEEPER BERTH																									7 1/2 HR
3: DRIVING																									14 HR
4: ON DUTY (NOT DRIVING)																									1 HR

	MID-NIGHT	1	2	3	4	5	6	7	8	9	10	11	NOON	1	2	3	4	5	6	7	8	9	10	11	TOTAL HOURS
REMARKS																									24
																									8 HR OFF REQUIRED

**70 HR/8 DAY DRIVERS**

TOTAL HRS. ON DUTY LAST 7 DAYS, INCL. TODAY

TOTAL HRS. AVAILABLE TOMORROW 70 HRS. MINUS A

TOTAL HRS. ON DUTY LAST 8 DAYS, INCL. TODAY

**60 HR/7 DAY DRIVERS**

TOTAL HRS. ON DUTY LAST 7 DAYS, INCL. TODAY

TOTAL HRS. AVAILABLE TOMORROW 60 HRS. MINUS A

TOTAL HRS. ON DUTY LAST 7 DAYS, INCL. TODAY

NOT REQUIRED

Shipping document, manifest number, or name of a shipper and commodity.  
Check the time and enter name of place you reported and where released from work and when and where each change of duty occurred. Explain excess hours.

FROM: **MAX. ON DUTY 15 HR**  
(STARTING POINT OR PLACE)

TO: **9 HR OFF DUTY**  
(DESTINATION OR TURN AROUND POINT OR PLACE)

**USE TIME STANDARD AT HOME TERMINAL**

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-MC-96-28

# HOURS OF SERVICE

ADMINISTRATIVE  
To Whom It May Concern,



Mr. Steve Wilson  
415 Oak Hill Drive Rd.  
Houston, MO 65483

96 NOV 27

LEGIS. RES. DIV.  
In regards to the upcoming changes in hours of service regulations. I would propose a driver selected set 8 consecutive hour period, printed on his CDL. During this 8 consecutive hour period, selected by the driver, he couldn't be required, nor permitted to be involved in any loading, unloading, driving or any other duties. As a persons biological clock requires sleep at approximately the same time daily, in order that alertness and reaction times stay at their best. This would alleviate many of the fatigue related accidents.

As a sleep disorder documentary, I watched, demonstrated how people on rotating shifts are involved in a greatly increased number of accidents while commuting to and from work. As you yourself can imagine, reporting to work at 7 A.M. fresh, alert, attentive, well rested and at your best. As you report in your boss informs you there is a cot in the backroom, go take a nap. Report back at 10 P.M., we will relieve you at 8:00 A.M. As you can imagine doing this you would not be at your peak, if you were involved with heavy machinery or other safety sensitive jobs, this would be an inviting disaster. A large percentage of America's truck drivers face this issue daily. I think you will agree if a driver were to list 10 P.M. to 6 A.M., for example, as the time he gets his best rest or any

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other 8 consecutive hours period, of his choosing, when he personally feels he gets his best sleep. This would enhance safety. I feel that being available to work 16 hours a day should be sufficient for any well managed company to fully utilize both the driver and the equipment. There should also be very severe fines for both driver and company should they violate this 8 consecutive hours of rest.

You will most assuredly notice the difference between the companies who are truly interested in safety and those who preach safety but who's true interest is in covering their own behind.

Under the current regulations, for example, a driver ready to work at 7 A.M. and being given a load that picks up at 10 P.M., delivers 10 hours down the road at 8:30 A.M. would be required to take this legal dispatch, under current regulations. Even though he can't sleep that day and will spend ~~what~~ <sup>it</sup> should be his 8 consecutive hours of sleep trying desperately to avoid an accident, deliver his load on time and thus avoid the wrath of both the safety department and dispatch.

As you can plainly see each individual knows when his biological clock demands rest. Please help each driver on the road, protect

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DOCKET 139000  
PAGE 2069



the motoring public and himself from another  
fatigue related accident.

Cordially,

Steve Wilson

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